From: stream hot mail [mailto:readingnorthreadingstreamteam@hotmail.com]
Sent: Friday, April 06, 2012 12:20 PM
To: Baskin, Kathleen (EEA)
Subject: Comments on Sustainable Water Management Initiative

April 6, 2012 (via email)

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)

Director of Water Policy and Planning

Executive Office of Environmental Affairs

100 Cambridge Street

Boston, MA

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. The Reading North Reading Ipswich River Streamteam has worked very hard to preserve the Ipswich River headwaters area, and, indeed, the residents of Reading Massachusetts are paying some of the highest water rates in the area due to the purchase of MWRA water to replace the withdrawals from the Ipswich River, have water restrictions in place continuously, and continue to work to sustain the Ipswich.

The SWMI process has taken laudable steps to assess what it takes to have sustainable water resources. The scientific findings and concept of developing ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to take care of our water resources so that future generations will be able to benefit from the same resources that we do. And that inlcudes rivers, streams and wetlands with enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet

the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows “non-essential” water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must re-craft this proposal to ensure restoration of degraded rivers, streams and wetlands. SWMI should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for considering our comments.

Sincerely,

For the Reading North Reading Stream Team,

Gina Snyder

readingnorthreadingstreamteam@hotmail.com